

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

ASHER BRONSTIN, individually and  
on behalf of all other similarly situated,

Plaintiff

v.

VIASAT, INC.,

Defendant

Civil Action No. 1:25-cv-00927-KMN  
(Hon. Keli M. Neary)

**DEFENDANT’S CONSENT MOTION FOR  
EXTENSION OF TIME TO RESPOND TO PLAINTIFF’S COMPLAINT**

Pursuant to Federal Rule of Civil Procedure 6(b), Defendant, Viasat, Inc. (“Defendant”), respectfully moves the Court for a thirty (30) day extension of its deadline to file a response to Plaintiff’s Complaint **through and including July 17, 2025.**

In support thereof, Defendant asserts as follows:

1. On May 27, 2025, Plaintiff served Defendant with the Complaint.
2. Defendant’s current deadline to respond to the Complaint is June 17, 2025.
3. Defendant recently retained the undersigned TCPA litigation counsel for representation in this matter, who require additional time to adequately investigate Plaintiff’s claims, prepare the appropriate responsive pleading(s), discuss the nature and basis for Plaintiff’s claims with Plaintiff’s counsel, and (if

appropriate) engage in early resolution discussions with Plaintiff's counsel that may obviate the need for responding altogether.

4. Defense counsel has conferred with Plaintiff's counsel on the requested extension, and Plaintiff's counsel has indicated in writing that Plaintiff agrees to the requested extension. *See* emails between counsel, attached hereto as Exhibit "A."

5. Therefore, good cause exists for the Court to grant the requested extension because, *inter alia*, the request is made in good faith, not for the purpose of delay, and will not prejudice any party or impact the timely resolution of this matter.

WHEREFORE, Defendant respectfully requests that the Court enter the accompanying proposed Order, or a substantially similar Order, extending Defendant's deadline to answer, move, or otherwise respond to the Complaint by thirty (30) days, **through and including July 17, 2025.**

Dated: June 12, 2025

Respectfully submitted,

/s/ Frederick P. Santarelli

FREDERICK P. SANTARELLI (PA 53901)

STEVEN C. TOLLIVER, JR. (PA 327165)

ELLIOTT GREENLEAF, P.C.

Union Meeting Corporate Center V

925 Harvest Drive, Suite 300

Blue Bell, PA 19422

(215) 977-1000 (phone)

(215) 977-1099 (fax)

FPSantarelli@elliottgreenleaf.com

sct@elliottgreenleaf.com

JOHN W. MCGUINNESS

*(Pro Hac Vice to be requested)*

A. PAUL HEERINGA

*(Pro Hac Vice to be requested)*

MANATT, PHELPS & PHILLIP, LLP

1050 Connecticut Avenue, NW, Suite 600

Washington, D.C. 20036

Telephone: 202-585-6500

Facsimile: 202-585-6600

[jmcguinness@manatt.com](mailto:jmcguinness@manatt.com)

[pheeringa@manatt.com](mailto:pheeringa@manatt.com)

*Counsel for Defendant Viasat, Inc.*

**LOCAL RULE 7.1 CERTIFICATE**

The undersigned hereby certifies that Defense counsel conferred with Plaintiff's counsel on the foregoing Motion, and Plaintiff's counsel indicated in writing that Plaintiff consented to the Motion.

Dated: June 12, 2025

/s/ Frederick P. Santarelli

FREDERICK P. SANTARELLI

*Counsel for Defendant Viasat, Inc.*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that I am causing the foregoing to be filed electronically with the Court, where it is available for viewing and downloading from the Court's ECF system, and that such electronic filing automatically generates a Notice of Electronic Filing constituting service of the filed document upon all counsel of record.

Dated: June 12, 2025

/s/ Frederick P. Santarelli

FREDERICK P. SANTARELLI

*Counsel for Defendant Viasat, Inc.*